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*Attorneys for Defendant Matthews
International Corporation*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TESLA, INC.,

Plaintiff,

v.

MATTHEWS INTERNATIONAL
CORPORATION,

Defendant.

Case No. 24-cv-03615-EJD

**DECLARATION OF JACOB MILLER
IN SUPPORT OF MATTHEWS'
OPPOSITION TO TESLA, INC.'S
EMERGENCY MOTION FOR A
TEMPORARY RESTRAINING ORDER**

Date: February 11, 2025
Time: 4:00 PM
Place: Courtroom 4, 5th Floor
Judge: Hon. Edward J. Davila

PUBLIC / REDACTED VERSION

1 I, Jacob Miller, declare as follows pursuant to 28 U.S.C. § 1746:

2 1. I am an attorney duly licensed to practice law in the state of New York. I have
3 been admitted *pro hac vice* in this action. I am an associate at Jones Day, attorneys of record
4 for Matthews International Corporation (“Matthews”) in this matter. I make this declaration in
5 support of Matthews’ Opposition to Tesla, Inc.’s Emergency Motion for a Temporary
6 Restraining Order.

7 2. I believe the facts stated herein to be true based upon my own personal knowledge.
8 I could and would testify competently thereto if called and sworn as a witness.

9 3. Attached as Exhibit 1 is a true and correct copy of a downloaded summary from
10 Yahoo Finance of Matthews’ NASDAQ stock price from the period June 13 to June 19, 2024.

11 4. Attached as Exhibit 2 is a true and correct copy of a report dated August 6, 2024,
12 titled “Moody’s Ratings downgrades Matthews’ CFR to B1 from Ba3 on weakening operating
13 performance.”

14 5. Attached as Exhibit 3 is a true and correct copy of a letter from Robert Courtney to
15 Ryan Walsh, dated November 18, 2024, with the subject line [REDACTED]
16 [REDACTED]

17 6. Attached as Exhibit 4 is a true and correct copy of Tesla’s [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 7. Attached as Exhibit 5 is a true and correct copy of [REDACTED]
22 [REDACTED]
23 [REDACTED]

24 8. Attached as Exhibit 6 is a true and correct copy of [REDACTED]
25 [REDACTED]

26 9. Attached as Exhibit 7 is a true and correct copy of a letter [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 10. Attached as Exhibit 8 is a true and correct copy of an email [REDACTED]

6 11. Attached as Exhibit 9 is a true and correct copy of [REDACTED]

10 12. Attached as Exhibit 10 is a true and correct copy of a downloaded summary from
11 Yahoo Finance of Matthews' NASDAQ stock price from the period February 3 to February 8,
12 2025.

13 13. Attached as Exhibit 11 is a true and correct copy of [REDACTED]

16 14. Attached as Exhibit 12 is a true and correct copy of the United States Patent and
17 Trademark Office file wrapper for Matthews' Application No. 62/796,333, [REDACTED]

20 15. Attached as Exhibit 13 is a true and correct copy of a document [REDACTED]

23 16. Attached as Exhibit 14 is a true and correct copy of excerpts from [REDACTED]

25 17. Attached as Exhibit 15 is a true and correct copy of excerpts from [REDACTED]

27 18. Attached as Exhibit 16 is a true and correct copy of excerpts from Thomas
28 Hackfort's notebook depicting the "all-in-one" machine, [REDACTED]

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[REDACTED]

19. Attached as Exhibit 17 is a true and correct copy of excerpts from [REDACTED]

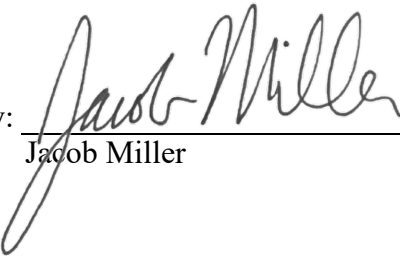
[REDACTED]

20. Attached as Exhibit 18 is a true and correct copy of a downloaded article from the Wall Street Journal, titled “Tesla Sues EV-Battery Supplier Over Alleged Disclosure of Trade Secrets,” dated June 17, 2024.

21. Attached as Exhibit 19 is a true and correct copy of a downloaded article from Reuters, titled “Tesla sues ex-supplier Matthews over EV battery trade secrets.”

22. I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York, on February 10, 2025.

By: 
Jacob Miller